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November 22, 2005

By Electronic (ECFS) Filing

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **WC Docket No 05-196 – e911 Compliance Letter**

Dear Ms. Dortch:

With this letter we describe Go2Call.com, Inc.'s ("Go2Call") efforts to comply with the Federal Communications Commission's order that an interconnected VoIP provider deliver e911 service to its subscribers (the "FCC Order") as required under 47 C.F.R. § 9.5(f). Please be assured that Go2Call takes the issues of public safety and e911 service very seriously and our product development efforts have, and will continue to be, focused on the delivery of the highest quality and most reliable access to e911 services.

Summary:

Go2Call is integrating its systems with Intrado's "v911 platform" to deliver full e911 services to any region where Intrado can deliver them and the best possible 911 connectivity where Intrado cannot deliver full e911 (but still in compliance with the FCC Order). However, presently Go2Call does not have any inbound-outbound services in use in the United States except for a small number of lines in testing or being used for demonstration purposes, and not in any residential or office environment, as described below. When Go2Call does roll out its full inbound-outbound solution in the United States and allow "real end-users" to use the service, it will include full compliance with the FCC Order.

Background:

Go2Call is a provider of wholesale voice-over-IP solutions to service providers around the world. The vast majority of our clientele distribute their services only outside of the United States due to our historical focus on discount outbound rates and prepaid billing services most utilized in countries where credit or post-payment billing terms are not usually provided. Go2Call's solutions generally provide for the placement of outbound international calls terminating to the PSTN through IP devices and our software dialer for Windows-based personal computers; we also offer an upgraded solution that includes the capability to receive inbound calls from the PSTN. A fully robust SMB, enterprise, and residential suite of solutions is in the final stages of development, but not yet rolled out in the United States. With the exceptions noted below, we sell only on an indirect, wholesale basis to distributors of our service, and there are no end-users of our upgraded inbound-outbound solution within the United States.

United States Customer Base:

Due to Go2Call's concerns regarding e911 issues, even before the release of the FCC Order, Go2Call has withheld distribution of inbound-outbound solutions within the United States (and certain other jurisdictions) to end-users. Accordingly, Go2Call does not presently have any end-users in the United States using any Go2Call solution capable of both receiving calls originated from the PSTN and terminating calls to the PSTN, except as follows:

- Beta services utilized in our own offices and by our own employees, each device marked with a "no-911" sticker and within proximity of a standard PSTN telephone with e911 service capability, used to debug and validate our solution (acknowledgments of service limitation have also been acquired from each user in our staff to which an inbound number, or DID, has been assigned);

- Test services used in labs of potential distributors; we have received acknowledgments, per assigned inbound number, from these potential distributors that no e911 service is available and instructed these distributors to place "no-911" stickers on the originating devices; and

- Wholesale services to one Go2Call distributor for the purpose of demonstrating to various Federal agencies, including FEMA, the efficacy of VoIP services in situations like disaster relief. This distributor has notified us that it has occasionally, upon the request of a Federal agency, but is not presently, utilized such services for actual disaster relief purposes. These services would never be used in a residential or office environment and only in the context of communications through satellite uplinks on a mobile basis (often in trucks), a service for which e911 is not practically required or expected (and for which no presently available solution could realistically provide e911). For these inbound DIDs we have received acknowledgements as to the lack of e911 service and instructed our distributor to place "no-911" stickers on the originating devices.

As is common in many industries, Go2Call is demonstrating and allowing testing of our inbound-outbound solution in advance of its being fully completed (including completion of our e911 integration with Intrado) as described in the bullets above. This is based on the commercial exigencies of making a market for our products and promoting them to potential distributors while we test, debug, and finalize the product. But we have fully committed as a company to the policy of disallowing any full-production distribution or usage of our inbound-outbound product until the platform has been completed, validated, and integrated with full e911 from Intrado (or others, as necessary).

To be clear and in the interests of full disclosure, Go2Call does have other end-users in the United States utilizing our discount international outbound-only services (similar to a discount calling card), but the FCC Order does not require e911 to be included with such unidirectional services. We also sell DIDs and inbound services on a wholesale basis to other carriers or VoIP providers. In addition, through the Go2Call website (http://www.go2call.com), any website visitor may register for a test DID that includes inbound-outbound capability and $.25 (twenty-five cents) in outbound calling credit in order to demonstrate our service (with our Windows-based software dialer only). Registrants for this service demonstration are required to acknowledge that no e911 service is available on this service, are recommended to include a notice to this effect near their computer, and are required to provide their country location. by November 28, 2005, United States based registrants will have their outbound PSTN services disabled such that the service will not be an "interconnected VoIP service" under the terms of the FCC Order.

Accordingly, we presently have no service in production in the United States which the FCC Order requires to include e911 service.

Status of e911 Compliance:

We realize that it may be unusual for an interconnected VoIP provider to report that it has no true end-users of its inbound-outbound service in the United States rather than to report that it has completed integration and is offering e911 services on its solution today. But we have elected to withhold services in the United States until we have had the opportunity to complete testing of our Intrado integration and until we can complete all of the back-office systems to support both e911 and the solution in general.

By the deadline imposed by the FCC Order, we expect to have successfully sent test e911 calls from our platform through the Intrado network. More work will need to be done to finalize the integration with the Intrado service on our production system, and no United States inbound-outbound service will be offered to

end-users until that integration is complete. Accordingly, it may be premature to report the status of the particular metrics required in the FCC Enforcement Bureau's Public Notice of November 7, 2005, since we are not today reporting completion of our e911 development efforts, but here is a brief summary of the status and planned implementation of e911 services according to the outline of the compliance letter components requested in that Public Notice:

- 911 Solution: Since Go2Call currently has no subscribers on our inbound-outbound services in the United States, we cannot quantify, on a percentage basis, the number of subscribers to whom we are able to provide 911 service. Our intention is not to bring on-line any subscribers until we can assure full compliance with applicable 911 requirements, primarily through the Intrado solution. For additional information on the Intrado solution, please see **Appendix A**, attached hereto, Section 1.

- 911 Routing Information / Connectivity to Wireline E911 Network: When launched, our service will transmit all calls to the appropriate PSAP or designated statewide default answering point or appropriate local emergency authority utilizing the Selective Router, the trunk lines between the Selective Router and the PSAP, and such other elements of the Wireline e911 Network as are necessary in those areas where Selective Routers are utilized, all to the extent required by applicable 911 requirements. Presently we have only integrated with Intrado, and thus we are only interconnected to the number of Selective Routers to the extent of Intrado's roll-out of e911 services. For further information, please see **Appendix A**, Section 2.

- Transmission of ANI and Registered Location Information: We will use the standard Intrado "v911" solution, and ANI and Registered Location information will be passed as required by the FCC Order. Of course, since we are not in production as of today, the requested quantifications, specific to Go2Call, cannot be provided. For further information on Intrado's support, please see **Appendix A**, Section 3.

- 911 Coverage: As discussed above, while we are theoretically capable of delivering e911 service to the extent of Intrado's roll-out of Selective Router integration, as we are not in production today we do not cover any area of the country. We anticipate rollout of our SMB and residential solutions by the end of Q1 2006, including full Intrado-based e911 service. We will only allow usage of the inbound-outbound service in regions where compliant service can be provided. Intrado has not provided Go2Call with detailed timing as to support for every region in the country and thus we cannot provide this information today, but we anticipate that Intrado will have completed its support for a vast majority of the country by the end of Q1 2006 and our support will be coextensive with Intrado's. To the extent necessary, we could support a region in advance of Intrado's rollout by integrating with other e911 service providers. For further information on Intrado's coverage, please see **Appendix A**, Section 4.

  In addition, were the FCC to modify or clarify the FCC Order to the effect that the delivery of 911 services which are not fully e911 compliant but are nonetheless "best efforts" services is permissible, Intrado does have a lesser grade of service – that which it will deliver to areas without Selective Router infrastructure – available across essentially the entire country today. So, in effect, were the FCC to allow usage of this service in regions where Selective Routers exist but Intrado has not yet fully interconnected with them, Go2Call would be capable of delivering at least a basic level of 911 support nationwide as of today.

- Obtaining Initial Registered Location Information: Since we have no inbound-outbound services in production in the United States today, we do not believe we are required to acquire any Registered Location information. However, we have manually collected location information for each test or demonstration service in place as part of our efforts to verify and enforce the non-production nature of these services, and we have hard copy records of location information for each such test or demonstration user. Registrants who obtain our test inbound-outbound accounts through our website are also required to provide their country locations (again, as above, United States users will

not have outbound calling capabilities and thus will not have access to interconnected VoIP service as defined by the FCC Order). When we roll out our full solution for use in the United States, our user registration and distributor administrative interfaces will automatically obtain user location information prior to initiation of the service. For further information on how Intrado supports Registered Location information, please see **Appendix A**, Section 5.

- Obtaining Updated Registered Location Information: Presently, due to the fact that there is no in-production use of our inbound-outbound service in the United States, the concept of updated location information is inapplicable. However, we have requested our distributors who are testing and/or demonstrating our service to update their location information as appropriate, and since they can pick up the phone to call us to do so, it is possible to update one's location through CPE. When we roll-out our full solution for use in the United States, the primary method of updating location information will be through web interfaces, however, users will be able to use their CPE to notify us of location changes as well. For additional information on support by Intrado, please see **Appendix A**, Section 6.

- Technical Solution for Nomadic Subscribers: Go2Call's inbound-outbound solution will allow nomadic usage. Intrado's database driven solution, described in greater detail on **Appendix A**, Section 7, will fully support nomadic usage to the extent of Intrado's roll-out of Selective Router integrations. We will obtain updated location information through web and CPE interfaces and update our Intrado records accordingly such that nomadic users can receive the fullest e911 support possible. As described above, users will have multiple options to update their location information, which we understand will be updated in Intrado's databases on a near real-time basis, thus supporting changes in location to route calls to the appropriate PSAP (or other answering point) in near real-time. Our present intention is to include within our system the deactivation of a user (or disconnection of a portion of the service for a user) who nomadically travels outside of a covered area, but we would appreciate a clarification from the FCC as to whether this deactivation is required (or even desired) by the FCC, as it is not presently clear whether we are required to disconnect all or a portion of the service provided to a nomadic user whose primary location is covered by e911 but who is temporarily located in a non-covered area (the FCC Enforcement Bureau's apparent approval of the "grandfather" concept draws this into doubt).

- Use of Automatic Detection Methods Suggested by AT&T, MCI, and Verizon Compliance Plans: Given that Go2Call is still in the process of finalizing our integration with Intrado, and that we do not presently have any inbound-outbound customers in the U.S. to which we are required to provide e911 service, we have not yet determined whether or how to implement any automatic detection mechanism that might identify when a customer may have moved their VoIP device. Noting that the FCC Order does not require any such mechanism and that the method chosen by AT&T, MCI and Verizon may have a disruptive impact on use of the service, we have elected to observe the efficacy of the mechanism used by AT&T, MCI, and Verizon prior to determining our own design. We are certainly willing to consider implementing such a mechanism once validated. Please also see **Appendix A**, Section 8 for an Intrado position statement as it relates to the services to which Go2Call has subscribed.

- New Interconnected VoIP Customers: As evidenced by Go2Call's "safety first" policy -- even prior to the FCC Order -- of disallowing use of our inbound-outbound services in the United States until we can deliver a satisfactory level of e911 service, we do not intend to promote or provide our service in areas where Go2Call does not provide compliant 911 services. We do intend to continue to provide testing and demonstration accounts to bona fide potential distributors upon verification that such accounts will not be placed in production or used outside of a lab or demonstration environment.

- "Grandfather" Process: Existing bona fide testing, demonstration, and like accounts will remain in place.

Please feel free to contact us with any questions or concerns you may have. As described above, we have used our best efforts to comply with the FCC Order by not allowing any United States based users of our inbound-outbound products while we push forward with all due haste towards a complete integration of the Intrado e911 service.

Best,

James Interlandi
General Counsel
Go2Call.com, Inc.

Appendix A

Supplemental Information on Intrado Roll-out of v911 Solution

1. 911 Solution; General Description.

The V9-1-1™ solution enabled by Intrado provides a true E9-1-1 solution for VoIP Service Providers. Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service is the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Intrado manages the VPC functionality and the Call delivery component on behalf of Go2Call thereby enabling a full end to end solution from one service provider.

The only Go2Call requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to the Intrado network to enable live 9-1-1 call delivery.

2. 911 Routing Information / Connectivity to Wireline E911 Network.

Currently through the assistance of Intrado's network providers, Intrado's VSP customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005.

3. Transmission of ANI and Registered Location Information.

- Basic PSAP: Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router.
- ANI Only: There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Intrado is currently aware of four (4) States and a Territory within Go2Call's planned service area that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) service to the PSAP. The following information explains the circumstances within these areas:
    - New Jersey - In the State of New Jersey Intrado has gained permission from the State to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.
    - Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.
    - Hawaii - To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population
    - Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population.

4. 911 Coverage.

Intrado reports: The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on customer subscriber base priorities. In addition, Intrado offers a map identifying deployment areas and target deployment dates, likely provided to the FCC by Intrado and other filers. We would be happy to provide that map, upon request.

5. Obtaining Initial Registered Location Information.

As a component of the Intrado V9-1-1 Service Go2Call has access to the Intrado Validation and Update Interface (VUI) which enables near real-time delivery of the Go2Call acquired or Go2Call user submitted address update information. Go2Call has nearly completed integration of VUI into our existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

6. Obtaining Updated Registered Location Information.

The V9-1-1™ Mobility Services provides Intrado Customers with a real-time provisioning interface to provision/register subscriber (location) data to Intrado to ensure the proper address and call back number is delivered to the appropriate PSAP at the time of a VoIP 9-1-1 call. This interface is named the Validation and Update Interface (VUI). Intrado's real-time provisioning process enabled by VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation at the time of provisioning. Go2Call will utilize our web portal and/or a service center by phone to enable the near real-time update to Intrado.

At the time of the VoIP 9-1-1 call Intrado uses Go2Call's customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Intrado also enables Go2Call to utilize the Intrado Level of Service (LoS) query integrated into the VUI application. This functionality enables a real-time query to Intrado with an address of a customer/end user for the purpose of determining the level of E9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable Go2Call and/or the user to determine E9-1-1 service level and take appropriate action.

7. Technical Solution for Nomadic Subscribers.

Through Intrado's V9-1-1™ Mobility Services, Go2Call will be able to route VoIP emergency calls from our VoIP network to the Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.

8. Use of Automatic Detection Methods.

Intrado recognizes the need for removing the user interaction and self provisioning component of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.